

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

vs.

ROBERT J. RAMOS, JR.

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CRIM. NO.: 1:12-cr-00158-LY(1)

DEFENDANT'S AGREED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **ROBERT J. RAMOS, JR.**, Defendant herein, by and through his attorney, CHARLES A. BANKER, III, and files this Agreed Motion For Continuance of his Docket Call Hearing and Final Pretrial and Jury Selection/Trial Hearings currently set for Friday, June 1, 2012 at 9:00 a.m. and Monday, June 4, 2012 at 9:00 a.m., respectively and for cause would show unto the court as follows:

I.

Defendant's attorney needs additional time to complete reviewing the voluminous amount of discovery related to this case and also needs to meet with his client to discuss said discovery. It is for this reason that Defendant's attorney requests at least a sixty (60) day continuance on this case.

II.

Defendant's attorney has consulted with Matthew Devlin, the Assistant United States Attorney assigned to this case and the Government is Not Opposed.

III.

This Continuance is made not for the purpose of delay but for justice to be done.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that this honorable court will grant the relief requested.

Respectfully Submitted,

/s/CHARLES A. BANKER, III
CHARLES A. BANKER, III
State Bar No. 01676780
Federal No. 8965
405 Main Street, Suite 910
Houston, Texas 77002
(713) 227-4100
(713) 222-2468-FAX
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of May, 2012, a true and correct copy of the foregoing Motion was delivered via the court's electronic filing system to the office of Matthew Devlin, the Assistant United States Attorney assigned to handle this case.

/s/CHARLES A. BANKER, III
CHARLES A. BANKER, III

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Matthew Devlin, Assistant United States Attorney, with regard to the foregoing motion and the Government is Not Opposed.

/s/CHARLES A. BANKER, III
CHARLES A. BANKER, III